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Attorneys for Plaintiff,

THE TRAVELERS INDEMNITY COMPANY OF CONNECTICUT

UNITED STATES DISTRICT COURT

CENTRAL DISTRICT OF CALIFORNIA – EASTERN DIVISION

THE TRAVELERS INDEMNITY
COMPANY OF CONNECTICUT, a
Connecticut Corporation,

Plaintiff,

vs.

MUHLHAUSER STEEL, INC., a
California Corporation; ANGELES
CONTRACTOR, INC., a California
Corporation, and DOES 1 through 10
inclusive,

Defendants.

CASE NO.: 8:24-cv-01913-CV-ADS

**TRAVELERS' OBJECTIONS TO
EVIDENCE SUBMITTED BY
ANGELES CONTRACTOR, INC.**

Date: February 27, 2025

Time: 10:00 a.m.

Place: 6D, 6th Floor

TO ALL PARTIES AND THEIR COUNSEL OF RECORD:

Plaintiff The Travelers Indemnity Company of Connecticut ("Travelers") submits the following objections to the evidence submitted by Angeles Contractor, Inc. ("Angeles") regarding Angeles' Joinder in Motion to Stay:

1 MATERIAL OBJECTED TO (AND 2 DESCRIPTION OF MATERIAL)	OBJECTION
3 1. Declaration of Jon S. Brick 4 at paragraph 2, which states: "In the 5 underlying action ACI seeks monetary 6 damages against MUHLHAUSER. 7 Because the damages ACI seeks in the 8 underlying suit are potentially covered 9 by the TRAVELERS insurance policy 10 issued to MUHLHAUSER, 11 TRAVELERS has named ACI as a 12 defendant in this coverage action."	Improper opinion testimony/legal conclusion. Fed. R. Evidence 701. Lack of Relevance. Fed. R. Evidence 401. Lack of personal knowledge. Fed. R. Evidence 602.
13 2. Declaration of Jon S. Brick 14 at paragraph 5, which states: "The 15 coverage issues TRAVELERS seeks to 16 determine in this coverage action are 17 dependent, at least in part, on issues 18 raised and the outcome of the 19 underlying litigation. Therefore, a stay 20 of this action pending the resolution of the underlying action is appropriate."	Improper opinion testimony/legal conclusion. Fed. R. Evidence 701. Lack of Relevance. Fed. R. Evidence 401. Lack of personal knowledge. Fed. R. Evidence 602.
21 3. Declaration of Jon S. Brick 22 at paragraph 6, which states: "In 23 addition, ACI was named as a 24 defendant in TRAVELERS' coverage 25 litigation on the sole basis that it seeks 26 damages from MUHLHAUSER in the 27 underlying litigation. It is extremely 28 prejudicial to ACI to require it to spend	Improper opinion testimony/legal conclusion. Fed. R. Evidence 701. Lack of Relevance. Fed. R. Evidence 401. Lack of personal knowledge. Fed. R. Evidence 602.

1 significant time and resources litigating
2 a coverage action between
3 TRAVELERS and MUHLHAUSER
4 while at the same time pursuing relief,
5 and defending crossclaims, in the
6 underlying action.”

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9 DATED: February 6, 2024

THE AGUILERA LAW GROUP, APLC

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11 s/: Lindsee B. Falcone

A. Eric Aguilera

Lindsee B. Falcone

V. René Daley

Counsel of record for plaintiff

The Travelers Indemnity Company of
Connecticut